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November 07, 2019

Hon. John Michael Vazquez, U.S.D.J.

United States Courthouse

NEWARK, N.J. 07102

VIA ECF-COURTS ONLY

Re: UNITED STATES v. GILLAR

Docket No. 17-0544 (JMV)

Dear Judge Vazquez:

In reference to the above pending criminal matter, I represent the defendant Mr. Roy Gillar.

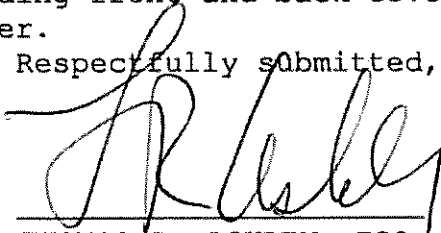
In conjunction with defendant's preparation of pretrial motions a copy of each page of defendant's United States passport, which is currently in possession of Pretrial Services, is required since defendant submits that the passport entries directly resolve the authenticity of the purported signature of Mr. Gillar on a GMB document produced by the Government in discovery. See attached e-mail dated December 03, 2018 to AUSA Jason Gould.

The Government previously consented to having a copy of defendant's passport provided to the undersigned. See attached e-mail dated December 03, 2018 from AUSA Jason Gould.

My prior request for this passport copy was rejected by Pretrial Services Officer Vincent Imbrosciano, who advised that a court order was required for him to produce the copy. See attached copy of e-mail dated November 30, 2018 from Vincent Imbrosciano.

Accordingly, I respectfully request that the Court please issue an order requiring Mr. Imbrosciano produce and transmit to the undersigned a legible copy of each page of defendant Gillar's passport (including front and back cover) within 10 days of entry of the order.

Respectfully submitted,

  
THOMAS R. ASHLEY, ESQ.


C: Mr. R. Gillar

AUSA JASON GOULD

ALL COUNSEL OF RECORD

Granted with the following limitation. Mr. Gillar may have a copy of the front of his passport along with any page containing his signature.

So Ordered.

  
John Michael Vazquez, U.S.D.J.

Date: 11/7/19

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Chris G. Alevras FYI SEE ATTACHED RE YOUR REQUEST TO Dec 3, 2018 at 1:27 PM



Gould, Jason (USANJ) Chris, Tom already consented to my Dec 3, 2018 at 1:33 PM



Chris G. Alevras Ashley's understanding is that the passport will c Dec 3, 2018 at 1:38 PM



Gould, Jason (USANJ) <jason.gould3@usdoj.gov> Dec 3, 2018 at 4:19 PM

To: Chris G. Alevras

Cc: ashleylaw@traesq.com

Chris,

I consent to Mr. Ashley receiving that information from pretrial services for the express purpose of using it as evidence at trial. Thanks.


Jason


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----- Forwarded Message -----

From: "Vincent Imbrosiano@njpt.uscourts.gov" <Vincent\_Imbrosiano@njpt.uscourts.gov>  
To: Chris G. Alebras <cgalaw300@yahoo.com>  
Cc: Gould Jason (USANJ) <jason.gould3@usdoj.gov>  
Sent: Friday, November 30, 2018, 3:58:31 PM EST  
Subject: Re: USA v GILLAR

Hello Chris,

A court order signed by the judge is needed to provide this information. Thanks.

Vincent Imbrosiano  
U.S. Pretrial Services Officer  
District of New Jersey  
973-645-6427 (phone)  
888-266-7165 (fax)

On Nov 30, 2018, at 3:15 PM, Chris G. Alebras <cgalaw300@yahoo.com> wrote:

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**From:** Chris G. Alevras <cgalaw300@yahoo.com>  
**Sent:** Monday, December 3, 2018 1:39 PM  
**To:** Gould, Jason (USANJ) <JGould1@usa.doj.gov>  
**Subject:** Re: USA v GILLAR

Ashley's understanding is that the passport will directly prove that on the date of a notarized statement, purporting to show Gillar was in Elizabeth New Jersey with his signature notarized by a Ms Perez, he was still in Thailand and didn't return to the US until about 8 days thereafter thereby disproving the validity of that notarization.

CGA

On Monday, December 3, 2018, 1:33:08 PM EST, Gould, Jason (USANJ) <[Jason.Gould3@usdoj.gov](mailto:Jason.Gould3@usdoj.gov)> wrote:

Chris,

Tom already consented to my request for a week's extension (see attached email), which is in conflict with this letter. In any event, I've already submitted a letter request to the Court, so you should let the Court know your position.